Message

From: Mohr, Ashley [Mohr.Ashley@epa.gov]
Sent: 11/7/2019 5:59:11 PM
To: Brian Burdorf [BBurdorf@trinityconsultants.com]
CC: Magee, Melanie [Magee.Melanie@epa.gov]; Shreyas Erapalli [SErapalli@trinityconsultants.com]
Subject: TGT - Ambient Analysis Follow-up

Brian,

I hope you are doing well.

Melanie informed me that the completeness letter for TGT was recently issued. I am aware that you all are working some additional information related to the permit application and thought that this might be the best time to re-engage on the revised air quality analysis that was submitted earlier this year. I did have 2 initial questions/comments on the revised analysis (dated May 2019):

1. Revised receptor grid – To address one of EPA's previous comments, a revised receptor grid was developed by TGT and used in the OCD modeling to evaluate predicted impacts on ambient air using the safety zone as the ambient air boundary. While we find the approach to use the safety zone as the boundary acceptable, it appears that modeled receptors were only included at the boundary itself and did not extend into ambient air beyond the boundary. We would expect that in addition to the boundary receptors, the modeled receptor grid would extend to cover ambient air beyond the boundary to ensure that the maximum impacts on ambient air are captured within the air quality modeling analysis. I know that OCD does have some limitations regarding the number of receptors modeled, but it should allow for a more extensive grid that the currently modeled Radial Safety Zone Receptor Grid. We have a recent example of an OCD modeling analysis in another EPA region that included multiple concentric circular grids in their analysis to estimate impacts on ambient air.
2. Constituents included in ESL modeling – In the initial modeling analysis submitted by TGT, which included shoreline receptors only, modeled impacts were compared with the ESL for crude. In the revised analysis, additional constituents were included in the State Health Effects Analysis based on speciation information. However, I was unable to locate revised ESL modeling results for crude based on the revised receptor grid. Please provide revised results for the ESL modeling for crude (taking into account Item 1, above).

If you have any questions regarding my comments, please let me know. I have included both Melanie and Shreyas on this email so that they are aware of this additional request.

Thanks,

Ashley

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